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6 Attorneys for Patrick John Dailey

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 \* \* \*

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 PATRICK JOHN DAILEY,  
15 Defendant.  
16

2:12-mj-717-GWF

**UNOPPOSED MOTION TO CONTINUE  
SENTENCING DATE**

17 COMES NOW the defendant, PATRICK JOHN DAILEY, by and through his counsel of  
18 record, Rene L. Valladares, Federal Public Defender, and Heidi A. Ojeda, Assistant Federal Public  
19 Defender, and files this Unopposed Motion to Continue Sentencing Date. This pleading is based  
20 upon the attached Memorandum of Points and Authorities and all of the papers and pleadings on file  
21 herein.

22 DATED this 15<sup>th</sup> day of October, 2013.

23 Respectfully Submitted,

24 RENE L. VALLADARES  
Federal Public Defender

25 /s/ Heidi A. Ojeda

26 HEIDI A. OJEDA  
27 Assistant Federal Public Defender  
28

1 **POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 Since the last court appearance, undersigned counsel spoke with Mr. Dailey, who indicated  
4 that he was in the hospital and battling severe medical issues. Mr. Dailey has a history of cancer  
5 and other serious medical conditions as noted in the Pre-Sentence Report completed by the Probation  
6 office. Counsel has been unable to confirm that Mr. Dailey will be available for his scheduled  
7 sentencing date tomorrow at 9:00 a.m.

8 Undersigned counsel has spoken with AUSA Nadia Janjua Ahmed and she does not oppose  
9 this motion.<sup>1</sup>

10 **CONCLUSION**

11 Wherefore, Mr. Dailey respectfully requests that this Honorable Court enter an Order  
12 continuing his sentencing date for thirty (30) days to determine the defendant's current medical  
13 situation.

14 DATED this 15<sup>th</sup> day of October, 2013.

15 Respectfully submitted,

16 RENE L. VALLADARES  
17 Federal Public Defender

18 */s/ Heidi A. Ojeda*

19 HEIDI A. OJEDA  
20 Assistant Federal Public Defender  
21 Counsel for Jason Alan Steele  
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28 <sup>1</sup> AUSA Nadia Ahmed is out of the office today and is unable to give consent for her  
signature on a stipulation.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,

2:12-mj-717-GWF

Plaintiff,

**ORDER**

vs.

PATRICK JOHN DAILEY,

Defendant.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that the sentencing date be continued to Wednesday, November 20, 2013, at the hour of 9:00 a.m.

DATED this 15th of October, 2013.

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on October 15, 2013, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO CONTINUE SENTENCING DATE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
NADIA JANJUA AHMED  
Assistant United States Attorney  
333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
Las Vegas, Nevada 89101

*/s/ Karen Meyer*

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Employee of the Federal Public Defender